

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

IN RE DEPAKOTE: RHEALYN)	
ALEXANDER, et al.,)	
)	Case No.
Plaintiffs,)	12-52-NJR-SCW
)	
v.)	LEAD CONSOLIDATED
)	CASE
ABBOTT LABORATORIES INC.,)	
)	
Defendants.)	
_____)	

DEPOSITION OF AL C. EDWARDS, M.D.
Monday, October 3, 2016
Greenville, South Carolina
8:59 a.m.

REPORTED BY: Karen K. Kidwell, RMR, CRR

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1 A. I -- I'd have to look back. I don't
2 remember.

3 Q. Okay. All right. Do you think you would
4 have -- let me ask you this: You have the 1999
5 Depakote PDR listing in front of you, Exhibit Number
6 2. When -- when do you think you would have -- you
7 would have first prescribed Depakote for patients?

8 A. You mean the year that I first prescribed
9 it?

10 Q. Yes, Doctor. Approximately, to the extent
11 you can recall.

12 A. Oh, goodness. Hmm. You know, I really
13 couldn't say. I mean, I --

14 Q. Do you think it was in medical school?

15 A. When was -- when was Depakote first
16 marketed?

17 Q. That's a fine question. I think it was,
18 Depakote maybe 1980, 1983 or so for Depakote. Don't
19 hold me to that.

20 A. The best I can recall back in about
21 probably the late '80s, early '90s, it was starting
22 to be used or some people had noticed some efficacy
23 for like bipolar disorder. And there may have been
24 somebody back in that era that I had on Depakote.

25 Q. Okay. All right. And so your general --

1 but your general practice had been to look at the PDR
2 for a medication before you prescribed it for the
3 first time?

4 A. Yeah.

5 Q. Okay. Now, I mean, did you have a
6 practice of, you know, from year to year going back
7 and looking at the PDR for the medications that you
8 prescribed?

9 A. You mean -- you mean each year reviewing
10 the PDR on each medication?

11 Q. Right.

12 A. Is that what you're asking?

13 Q. That is what I'm asking.

14 A. Probably not.

15 Q. So it wouldn't have been the case that,
16 you know, when the 1999 Depakote PDR came out, that,
17 oh, you -- I'll rephrase that so I'll strike that.

18 When the new PDR for 1999 came out with
19 all of the medications contained in it, you didn't go
20 sit down with that PDR and start flipping through it
21 to look up all the medications that were part of the
22 constellation of medications --

23 A. No.

24 Q. -- that you were prescribing?

25 A. No.

1 Q. Right. Are there -- so after you had, you
2 know, started prescribing medication, what sort of
3 events would motivate you to go back and look at the
4 prescribing information?

5 A. Well, obviously, if you see somebody with
6 a problem.

7 Q. Of course.

8 A. Look into it a little deeper sometimes.
9 And back -- I mean, things are online now. You can
10 look up things online, but back then, you got the
11 green journal, you know, sort of the industry
12 journals that would have up-to-date information or
13 articles that were written, you know, about problems.
14 Or, you know, advances or whatever that they would be
15 in.

16 And some -- I mean, that's kind of what,
17 you know. And I guess sometimes over the years, the
18 drug detail folks bring by information, things like
19 that, you know, on the drugs that they're marketing.

20 Q. Sure. But just -- just in terms of just
21 focusing in on this -- on the PDR, can you say with
22 any degree of certainty that you would have looked at
23 the 1999 PDR back in, you know, in -- prior to
24 prescribing Depakote for Mrs. Burnett?

25 MS. WILLIAMSON: Object to the form.

1 Q. I mean, there -- the reality is that she
2 needed treatment, correct?

3 A. Yes.

4 Q. Okay. And Depakote may very well have
5 been the only reasonable treatment for her condition
6 at that time?

7 MS. WILLIAMSON: Object to the form.
8 Leading. Asked and answered.

9 THE WITNESS: It was one that seemed to be
10 a more simple regimen and has potential benefit.
11 I mean, whether one could construct a different
12 treatment regimen to come out with the same
13 result, it would have been more complex and
14 maybe just as risky.

15 BY MR. EVANS:

16 Q. Certainly as you sit here right now, you
17 can't say that there was another, you know, treatment
18 regimen that you thought was a more reasonable
19 treatment regimen than the Depakote?

20 MS. WILLIAMSON: Object to form. Asked
21 and answered. Mischaracterizes prior testimony.

22 THE WITNESS: That's right.

23 BY MR. EVANS:

24 Q. All right, Doctor. Let's run through some
25 records with you.

1 CERTIFICATE OF REPORTER

2 I, Karen K. Kidwell, Registered Merit
Reporter and Notary Public for the State of South
3 Carolina at Large, do hereby certify:

4 That the foregoing deposition was taken
before me on the date and at the time and location
stated on page 1 of this transcript; that the
5 deponent was duly sworn to testify to the truth, the
whole truth and nothing but the truth; that the
6 testimony of the deponent and all objections made at
the time of the examination were recorded
7 stenographically by me and were thereafter
transcribed; that the foregoing deposition as typed
8 is a true, accurate and complete record of the
testimony of the deponent and of all objections made
9 at the time of the examination to the best of my
ability.

10 I further certify that I am neither related
to nor counsel for any party to the cause pending or
11 interested in the events thereof.

12 Witness my hand this 10th day of October, 2016.

13
14

15 _____
Karen K. Kidwell,
Registered Merit Reporter
16 Notary Public
State of South Carolina at Large
17 My Commission expires:
August 21, 2024

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